

September 21, 1995

NJDEP
INDUSTRIAL SITE
EVALUATION ELEMENT
09/28/95
TRENTON, NJ

Joseph J. Nowak
New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation & Cleanup Responsibility Assessment
401 East State Street
Trenton, NJ 08625

SUBJ: Modifications to Product Recovery Program
Hexcel Corporation
Lodi Borough, Bergen County, New Jersey
ISRA Case No. 86009

Dear Mr. Nowak:

This is in follow-up to our telephone conversation of September 19, 1995. As you requested, this letter describes our modified product recovery program. The current product recovery process is extremely time consuming with little benefit to site cleanup. Therefore, we are modifying the product recovery program starting this week.

Hexcel's increased product recovery efforts have yielded insignificant additional volumes of product recovered. In accordance with the New Jersey Department of Environmental Protection (NJDEP) letter dated June 12, 1995, Hexcel has attempted to recover product weekly at the numerous well locations specified in the last progress report. This has increased the time and cost for product recovery substantially without significantly increasing the volume of product recovered.

Beginning this week, Hexcel will revise the wells included in the recovery program as follows:

- If no measurable amount of product is recovered from a given well for three consecutive weeks, that well will be monitored and recovered monthly thereafter.
- If a measurable amount of product is recovered from a well on a monthly event, then that well will be included in the weekly product recovery thereafter.



- Hexcel will deviate from the above guidelines when it is deemed appropriate based on current and historical observations. For example, well CW-7 has failed to have measurable recovered product for the last three weeks, yet its historical tendency to have significant amounts of product justifies its continuation in the weekly recovery program.

We will provide further details, including data tabulation of product collection in our next progress report in October 1995. In the meantime, please call if you have questions regarding modifications to the product recovery program. We will implement these changes immediately unless advised otherwise by you.

Sincerely,

GEO ENGINEERING, INC.


Marjorie A. Piette
Project Manager

MAP/avm

cc A. William Nosil
Lisa Bromberg, Esq.